

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

JOHN SULLIVAN,
Defendant

CRIMINAL NO. 1:23-cr-10039-DJC

**ASSENTD TO EMERGENCY MOTION TO ORDER U.S. MARSHAL'S TO KEEP MR.
SULLIVAN AT WYATT DURING THE PENDENCY OF HIS MOTION FOR
COMPASSIONATE RELEASE**

Now comes the Defendant, *John Sullivan* (“*Sullivan*”), by and through his counsel, and respectfully moves this Honorable court to order the Marshal’s Service to keep Mr. Sullivan at Wyatt until his motion for Compassionate Release is ruled upon.

In support of this Motion, on December 27, 2024, counsel filed an Amended Motion for Compassionate Release. On the same date, the Government filed a Motion for Extension of Time (assented to) provide a response until January 10, 2025. As outlined in his Amended Motion for Compassionate Release, Mr. Sullivan is dealing with serious health issues and is unable to provide self-care in a correctional environment.

On December 31, 2024, Counsel received an email from the Marshal's Service indicating Mr. Sullivan was to be transported to FCI-Allenwood on January 3, 2025.

Moving to his place of designation is a traumatic undertaking for Mr. Sullivan given his inability to provide self-care in a correctional environment. While Mr. Sullivan's Motion for Compassionate Release is pending, Counsel moves the Court to order the U.S. Marshal's Service to keep him at Wyatt Detention Center.

The Government does not oppose this motion.

DATE: January 1, 2025

Respectfully submitted,
John Sullivan
By his attorney,

/s/ Jeffrey Miller
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CERTIFICATE OF SERVICE

I, Jeffrey Miller, hereby certify that this document, filed through the ECF System on January 1, 2025 will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF), and that papers will be sent to all non-registered participants who have appeared in this case.

/s/ Jeffrey Miller
Jeffrey Miller